

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_<sup>x</sup>  
JEFFREY S. VAUGHN, individually and on behalf  
of those Class Members similarly situated,

Civil Case No.: 04 CV 08391

Plaintiffs,

-against-

**STIPULATION**

LEEDS, MORELLI & BROWN, P.C., LEEDS,  
MORELLI & BROWN, LLP., LEEDS & MORELLI,  
LEEDS, MORELLI & BROWN, PRUDENTIAL  
SECURITIES, INC., Successor PRUDENTIAL  
FINANCIAL, INC., WACHOVIA CORPORATION,  
WACHOVIA SECURITIES, LLC, LENARD LEEDS,  
STEVEN A. MORELLI, JEFFREY K. BROWN, and  
JOHN DOES, JAMES VAGNINI, FREDERIC DAVID  
OSTROVE, ROBERT JOHN VALLI, FR., DISCRIMINATION  
ON WALL STREET, INC. and DISCRIMINATION ON WALL  
STREET MANHATTAN, INC., AND JOHN DOES, ESQS,  
1-10 a fictitious designation for presently unknown licensed  
Attorneys, professionals and/or unknown persons or entities,

**JUDGE: COTE**

Defendants.  
\_\_\_\_\_x

WHEREAS the parties previously entered into stipulations extending defendants' time to answer, move or otherwise respond to the First Amended Complaint to 30 days after service of the First Amended Complaint, each stipulation being "so ordered" by this Court on February 9, 2005 and February 23, 2005, respectively; and

WHEREAS the Court subsequently ordered, on March 4, 2005, that plaintiff shall file his amended complaint by March 15, 2005; and

WHEREAS defendants' time to respond is on or about April 15, 2005;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel that the time for defendants to answer, move or otherwise respond to the First Amended Complaint is extended from April 15, 2005 to April 22, 2005.

Dated: April 13, 2005

Blaine Bortnick

BLAINE H. BORTNICK  
Liddle Robinson, LLP  
Attorney No.: BB-3686  
Attorney for Plaintiff  
685 Third Avenue  
New York, New York  
(212) 687-8500  
*Attorneys for Plaintiff*

Daniel T. Hughes

DANIEL T. HUGHES, ESQ.  
Litchfield Cavo, LLP  
Attorney No.: DH- 4622  
Attorney for Leed, Morelli & Brown  
420 Lexington Avenue – Suite 1750  
New York, New York 10170  
(212) 434-0100  
*Attorneys for Defendant Leeds, Morelli  
& Brown, P.C., and individual Defendant  
members or associates of Leeds, Morelli &  
Brown, P.C.*

Beth Frank

Beth Susan Frank  
Attorney No.: BF- 0293  
Paul, Weiss, Rifkind, Wharton & Garrison, LLP  
1285 Avenue of the Americas  
New York, NY 10019  
(212) 373-3000  
-and-  
Lowenstein Sandler, P.  
1330 Avenue of the Americas  
New York, NY 10019  
*Attorneys for Prudential Securities, Inc. and  
Prudential Financial, Inc.*

**SO ORDERED:**

---

U.S.D.J